

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICTS OF ARKANSAS  
TEXARKANA DIVISION**

**TROY H. BRADFORD AND GLORIA  
BRADFORD, Individually and as Class  
Representatives on Behalf of All  
Similarly Situated Persons; and  
BOOKS ETC., by and through TROY  
AND GLORIA BRADFORD, Class  
Representatives on Behalf of All Those  
Similarly Situated;**

**PLAINTIFFS**

**VS.**

**Case 4:05-cv-4075 HFB**

**UNION PACIFIC RAILROAD  
COMPANY  
A Delaware Corporation**

**DEFENDANT**

**SECOND STIPULATED MOTION TO  
EXTEND TIME TO FILE PLAINTIFFS' BRIEF IN SUPPORT OF CLASS  
CERTIFICATION AND  
EXTEND TIME TO SUBMIT DISCOVERY RESPONSES**

The Parties file this Stipulated Motion for Second Extension of Time to Submit Discovery Responses for Plaintiffs to submit discovery responses on June 30, 2006; and the Second Extension for Plaintiffs to file their Brief in Support of Class Certification on June 30, 2006 and would show the Honorable Court as follows:

1. Defendant Union Pacific submitted discovery requests pursuant to Fed. R. Civ. P. 33 and 34 on May 31, 2006, and Defendant filed that day their Motion to Shorten Time for Discovery, such Motion requesting that the honorable Court order Plaintiffs to submit responses to the aforementioned discovery within ten (10) days of service thereof.

2. On June 15, 2006, the Court ordered that Plaintiffs submit their responses to the aforementioned discovery requests by June 26, 2006;
3. On June 27, 2006, the Parties filed their stipulated Motion for Extension of Time to File Responses to allow that such responses be submitted by 5:00 p.m., June 27, 2006; and the Court granted the Parties Motion.
4. Counsel for the Parties have conferred as to the submission date of the aforementioned discovery responses; and have stipulated that such discovery responses may be submitted no later than Friday, June 30, 2006.

And;

5. Where the Court, on June 20, 2006 granted Plaintiffs' unopposed Motion for Extension of Time to File Motion for Class Certification up to and including June 27, 2006;
6. Counsel for the Parties have conferred as to the due date of the Plaintiffs' Motion for Class Certification; and have stipulated that Plaintiffs' Motion for Class Certification may be submitted no later than Friday, June 30, 2006.

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WHEREFORE, PREMESIS CONSIDERED, the Parties pray that the honorable Court extend the time for Plaintiffs to file their responses to the aforementioned discovery until June 30, 2006; and that the Court extend the time for Plaintiffs to file their Motion for Class Certification until June 30, 3006.

**RESPECTFULLY SUBMITTED** this 27<sup>th</sup> day of June, 2006,

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s/ Roger W. Orlando  
Roger W. Orlando

**ATTORNEYS FOR PLAINTIFFS**

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s/ Sean F. Rommel  
Sean F. Rommel

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I, M. David Karnas, one of the attorneys for the Plaintiffs, hereby certify that on the 27th day of June, 2006, I electronically filed the foregoing Stipulated Motion to Extend Time to File Discovery Responses with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following attorneys:

**Attorneys for Defendants:**

George L. McWilliams  
Sean F. Rommel  
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s/ M. David Karnas  
M. David Karnas